

the first and second resources then the first and second resource positions could never be consistent with the rule set).

Turning to the prior art, as recognized by the Office Action, Tanikoshi fails to teach or suggest the step of specifying that a first resource communicates with a second resource. In addition, despite statements in the Office Action, Tanikoshi fails to teach or suggest any of the steps of providing a rule set that indicates probable relative resources positions, specifying that a first resource communicates with a second resource, determining if the relative juxtapositions of the first and second resources are consistent with the rule set or performing a secondary function when the relative juxtapositions of the first and second resources are inconsistent with the rule set.

The Office Action cites Tanikoshi's col. 2, lines 39-61 as teaching the step of providing a rule set that indicates probable relative resource positions. Col. 2, lines 39-54 describe a system wherein location has nothing to do with identifying a machine to be controlled or monitored and instead, an external appearance of the machine, sounds or temperature distribution of the machine are stored and are compared to information input via an input device to identify a specific machine. For instance, in at least some embodiments an image of a machine may be obtained and compared to the stored external appearance of the machine to identify a machine to be controlled or monitored. This portion of the citation appears to have been in error as the teachings are wholly unrelated to providing a rule set that indicates relative juxtapositions of resources.

The remainder of this cite teaches that a portable terminal device can determine its location and direction within a facility and that a map exists that identifies the actual locations of components (e.g., machines) within the facility. Once the location of and direction of the portable device is known, Tanikoshi's system can use the map information to identify which component the portable device is pointing at within the facility. Tanikoshi's map indicates actual positions of components, not probable relative positions. Tanikoshi's portable device can be moved to any location within the facility and therefore there are no rules which indicate probable relative position of the portable

device to other components within the facility. Thus, col. 2, lines 39-61 fails to teach or suggest providing a rule set that indicates probable relative resource positions.

Applicant has examined Tanikoshi in detail and is clear that the un-cited parts of Tanikoshi also fail to teach providing a probable relative resource position rule set. In the event that the current rejection of claim 54 is maintained Applicant requests that the Examiner clearly indicate where Tanikoshi even remotely suggests providing a rule set including rules that indicate probable relative positions of resources.

The Office Action cites Tanikoshi's col. 4, lines 26 through 56 as teaching the steps of identifying the relative juxtapositions of the first and second resources and determining if the relative juxtapositions of the first and second resources are consistent with the rule set. The col. 4 citation teaches a method for locating the portable terminal device within a facility and once the portable device location is known, the relative position of the portable device within the facility with respect to components should also be known. However, the col. 4 citation teaches absolutely nothing about determining if the relative juxtapositions of the portable device and the other components are consistent with the rule set that indicates probable relative juxtapositions of the resources. Failure to teach or suggest the determining step is not surprising since, as described above, Tanikoshi does not teach the probable relative resource position rule set in the first place. In addition, as indicated above, Tanikoshi fails to contemplate that there may be any restrictions on the location of Tanikoshi's portable device and therefore how could there possibly be any probable relative resource position rule set related to the portable device (i.e., the "first device" as interpreted in the Office Action) that could be applied. In short, Tanikoshi's portable device may be positioned anywhere within Tanikoshi's facility so it would make no sense to compare the portable device's location to a rule set specifying probable relative resource position.

The Office Action cites Tanikoshi's col. 4, lines 2-56 as teaching that when the relative juxtapositions of the first and second resources are inconsistent with the rule set, performing a secondary function. Applicant has reviewed the cited col. 4 reference

and is clear that the citation fails to even remotely suggest a secondary function when a probable relative resource position rule set is inconsistent with the relative juxtapositions between first and second resources. Again, Tanikoshi fails to teach a probable relative resource position rule set and therefore it should not be surprising that Tanikoshi fails to premise a secondary function on a comparison to such a rule set. In the event that this rejection is maintained Applicant requests that the Examiner clearly point out where Tanikoshi teaches or suggests a rule set or a secondary function which is performed when current positions are inconsistent with such a rule set. Also please point out clearly what is considered to be the secondary function that occurs upon inconsistency so that Applicant has a chance to respond more precisely to the rejection.

While Eidson teaches that devices may share packets on a network, Eidson fails to teach or suggest any of the limitations described above which Tanikoshi lacks and therefore, the combination of Tanikoshi and Eidson cannot possibly result in a method which meets all of the claim 54 limitations. For at least the above reasons claim 54 and claims that depend there from are patentable over the cited references and Applicant requests that the current rejections be withdrawn.

Regarding claim 57, claim 57 further limits claim 54 by requiring that the rule set specify a maximum distance between the first and second resources. Nothing in Tanikoshi teaches or suggests a rule set which specifies a maximum distance between a first resource and a second resource. In fact, based on Tanikoshi's teachings, it appears as though the portable device can be used to select a distant component as long as there is no other component between the portable device and the distant component by simply pointing the portable device at the distant component. For at least this additional reason Applicant requests that the current rejection of claim 57 be withdrawn.

Claim 58 further limits claim 54 by requiring that the secondary function is to indicate that the specified communication is improbable. The Office Action cites Tanikoshi's col. 4, lines 25-41 as teaching this limitation. Applicant has examined the cited section of Tanikoshi in detail and is clear that there is no teaching regarding any type of secondary function when juxtapositions are inconsistent with a rule set. Instead, the citation simply describes an embodiment of the portable device. For at least this additional reason Applicant requests that the current rejection of claim 58 be withdrawn.

Each of independent claims 63 and 65 include limitations that are similar to the limitations of claim 1 described above and each of those claims is patentable over the Tanikoshi and Eidson combination for the same reasons that claim 1 is patentable. Thus, for the reasons described above with respect to claim 1 Applicant requests that the current rejections of claims 63 and 65 and claims that depend there from be withdrawn.

Independent claim 68 requires, among other things, the steps of associating a process with a space within an environment and when an information device is proximate an environment sub-space, identifying resources to be positioned within the subspace, identifying tags associated with the resources and indicating the tags associated with the resources.

The Office Action cites Eidson, col. 1, lines 26-54 as teaching the step of identifying resources to be positioned within a subspace. This citation teaches nothing about identifying resources to be positioned within a subspace. Instead the citation describes a simple binding process used to indicate component addresses on a network which has nothing to do with the physical locations of the components within an environment subspace.

For at least this reason Applicant requests that the Examiner withdraw the current rejections of claim 68 and claims that depend there from. In the event that this

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rejection is maintained Applicant requests that the Examiner more clearly indicate where Eidson contemplates that step of identifying resources to be positioned within a sub-space.

Applicant believes the amended set of claims recites patentable subject matter and allowance of the same is requested. No fee in addition to the fees already authorized in this and accompanying documentation is believed to be required to enter this amendment, however, if an additional fee is required, please charge Deposit Account No. 17-0055 in the amount of the fee.

Respectfully submitted,

DAVID W FARCHMIN

Date: 3-22-11

By:   
Michael A. Jaskolski  
Reg. No. 37,551  
Attorney for Applicant  
QUARLES & BRADY, LLP  
411 East Wisconsin Avenue  
Milwaukee, WI. 53202-4497  
(414) 277-5711